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February 6, 2006

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## VIA ECFS

Marlene H. Dortch Secretary Federal Communications Commission 236 Massachusetts Avenue, N.E. Suite 110

Washington, D.C. 20002

Re: EB-06-TC-060

Certification of CPNI Filing, February 6, 2006

## Dear Madame Secretary:

Pursuant to the Commission's Public Notice DA 06-223 dated January 30, 2006, transmitted herewith on behalf of Cleveland Unlimited, Inc. d/b/a Revol and Cleveland Limited License Sub, LLC (collectively, "Revol") is the Certification of CPNI Filing for Revol in the above-referenced docket.

In the event that the Commission or its staff should have any questions concerning this filing, please refer them to undersigned counsel for Revol.

Very truly yours,

Steven Rich

or PAUL, HASTINGS, JANOFSKY & WALKER LLP

## CERTIFICATE

I, Rocky Crossland, an officer of Cleveland Unlimited, Inc. d/b/a Revol and Cleveland Limited License Sub, LLC (collectively, "Revol"), certify as agent for Revol that I have personal knowledge that Revol has established operating procedures that are adequate to ensure compliance by Revol and its affiliates and subsidiaries with the rules of the Federal Communications Commission contained in Part 64, Subpart U of the Code of Federal Regulations. Attachment 1 hereto describes these operating procedures.

Rocky Crossland

February 6, 2006

## Attachment 1

Revol is a provider of Commercial Mobile Radio Service ("CMRS") and does not offer telecommunications services to its customers in categories other than CMRS. Revol does not currently use customer proprietary network information ("CPNI") for internal marketing purposes or share CPNI with affiliates or with third parties, other than pursuant to requests by duly-authorized law enforcement officials. Consequently, Revol is not required to and does not maintain either an "opt-in" or "opt-out" system with respect to CPNI. In the event that Revol were to change the ways in which it uses CPNI, any such change would be reviewed and approved by the company's CEO, who is familiar with the FCC's rules governing the use of CPNI and who is the certifying officer for CPNI purposes.

Revol has established procedures to maintain the security of CPNI of its customers. For example, Revol maintains all CPNI on a secure server using a proprietary database, and CPNI is accessible only to select, specially-trained employees within Revol's call center and network operations group. Revol representatives will discuss customer account information only after a caller has presented unique identifying information establishing that the requesting party is, in fact, the subscriber whose records are requested. Revol provides call detail records only to customers who make an in-person request in a Revol store and present valid identification, or to law enforcement officials who present a valid subpoena. The Revol employee handbook expressly prohibits the divulgence of any confidential customer information, and provides for immediate punishment upon a violation of this prohibition, up to and including termination of employment.